

REMARKS

No claims have been amended, added or cancelled. Claims 1, 3-8, 10-48, and 50-57 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejection:

The Examiner rejected claims 1, 3-7, 11, 13-26, 29, 31-48, 51 and 53-57 under 35 U.S.C. § 102(e) as being anticipated by Ballantyne et al. (U.S. Patent 6,687,873) (hereinafter “Ballantyne”). Applicants respectfully traverse this rejection for at least the reasons presented below.

Regarding claim 1, contrary to the Examiner’s assertion, Ballantyne fails to disclose a service in a distributed computing environment generating results data for a client in the distributed computing environment; and accessing a presentation schema in the distributed computing environment, wherein the presentation schema includes information for presenting results data for clients, and wherein the presentation schema is provided by the same service in the distributed computing environment that generated the results data for the client.

Instead, Ballantyne discloses a system that modifies and recompiles legacy program applications to output data in XML format. Ballantyne’s system includes a code generation system that allows analysis of legacy program applications and generation of modified legacy program applications. After modification, the legacy applications are able to directly output syntactically correct XML data. (see, Ballantyne, column 6, lines 15-26). Ballantyne’s system is concerned with analyzing and modifying legacy applications to output XML data. Thus, a legacy application is first analyzed to determine where data are outputted and then the legacy application is modified to output XML formatted data in place of, or in addition to, the originally outputted data.

Ballantyne does not disclose a service in a distributed computing environment that both generates results data for a client and provides a presentation schema that includes information for presenting results data for clients in the distributed computing environment. Instead, Ballantyne teaches that modeling engine 28 includes a modeling/mapping graphical user interface 30 that allows programmers to create and modify an XML schema that is used to modify legacy applications (Ballantyne, column 6, lines 48-65). However, since modeling engine 28 does not generate results data for a client in a distributed computing environment, Ballantyne clearly fails to anticipate *a service* in a distributed computing environment *generating results data for a client* in the distributed computing environment; and accessing a presentation schema in the distributed computing environment, wherein the presentation schema is provided by the same service.

The Examiner responds to the above argument by citing columns 17-18 of Ballantyne. The Examiner specifically refers to Ballantyne's discussion of the benefits of his modified legacy applications outputting XML data rather than just printing data. The Examiner refers to Ballantyne's discussion regarding how outputting XML reports allows businesses to take advantage of e-commerce solutions, such as automatic bill payment and email-based billing reports. The Examiner is apparently equating any legacy application modified by Ballantyne's system the service of Applicants' claim 1. For instance, in both the rejection of claim 1 and the response to arguments regarding claim 1, the Examiner refers to a modified legacy application generating invoices and billing states as a service generating results data. However, Ballantyne's modified legacy applications do not also provide a presentation schema that includes information for presenting the results data. Nowhere in the cited passage (columns 17-18) or elsewhere does Ballantyne mention one of his modified applications providing a presentation schema. As noted above, Ballantyne teaches that modeling engine 28 includes a modeling/mapping graphical user interface 30 that *allows programmers to create or modify an XML schema* (Ballantyne, column 6, lines 48-65). Thus, Ballantyne clearly teaches that programmers, and not any modified applications, provide XML schemas.

Moreover, Ballantyne's XML schemas are used to modify the legacy applications. Ballantyne specifically teaches that his code generation engine create a modified program in accordance with a modification specification created by a mapping engine and that the mapping engine generates the modification specification "by mapping a model of write operations of the legacy computer system to an XML schema" (Ballantyne, column 3, lines 12-22). As noted above, Ballantyne's system provides a user interface so that a programmer can create the XML schema used by the mapping engine. Thus, the XML schema used in Ballantyne's system is generated and provided by a mapping engine to the code generation engine before a legacy application is even modified and therefore the modified legacy application cannot be said to provide the schema, contrary to the Examiner's contention.

Applicants remind the Examiner that anticipation under 35 U.S.C. § 102(e) is a standard of strict identity. Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). For at least the reasons presented above, the rejection of claim 1 is clearly not supported by the cited art and withdrawal of the rejection is respectfully requested. Similar arguments apply in regard to independent claims 24, 42, 46 and 48.

Regarding claim 3, Ballantyne fails to disclose wherein generating the results data is performed in response to the client sending a request message in a data representation language to the service, wherein the request message requests the service to perform a function on behalf of the client and wherein the function generates the results data when performed by the service. The Examiner cites columns 17-18 of Ballantyne, which (as described above regarding claim 1) describe various benefits to modifying legacy applications to output XML formatted data. However, the cited passage does not teach

that the modified applications generate results data, such as the billing statements or invoices mentioned by the Examiner, in response to a client sending a request message in a data representation language to the service. Instead, Ballantyne discusses that the XML output from modified applications may be stored in a database for later retrieval or for integration into other applications. (see, Ballantyne, column 17, lines 15-24; 33-36; and line 65 – column 18, line 2). The Examiner argues that a “user may request billing statements or invoices.” However, the Examiner has misrepresented the teachings of Ballantyne. Ballantyne teaches that “individual telephone customers could receive their telephone bill by e-mail containing a web link to a site that provides the individual’s bill detail” (Ballantyne, column 17, lines 50-52). Sending a bill to a customer in an email is very different from a service generating results data in response to receiving a request from a client in a data representation language.

Furthermore, the Examiner has not cited any portion of Ballantyne that mentions a modified legacy application generating output in response to a request message *in a data representation language* from a client. Ballantyne does not mention anything regarding a client sending a request message in a data representation language.

Thus, for at least the reasons above, the rejection of claim 3 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks also apply to claims 25 and 36.

Regarding claim 4, Ballantyne fails to disclose a client sending a request message in a data representation language to the service, wherein the data representation language is eXtensible Markup Language (XML). The Examiner argues that the “data presentation language used by Ballantyne is XML.” However, whether or not Ballantyne uses XML as a data presentation language has no relevance, nor does it imply, a *client sending a request message in a data representation language*. Thus, the rejection of claim 4 is not supported by the prior art and removal thereof is respectfully requested.

Section 103(a) Rejection:

The Examiner rejected claims 8, 10, 27, 28 and 50 under 35 U.S.C. § 103(a) as being unpatentable over Ballantyne. Applicants traverse the rejection of claims 8, 10, 27, 28 and 50 for at least the reasons given above regarding their respective independent claims.

In further regard to claim 8, Ballantyne does not teach or suggest providing a results advertisement for the results data stored on the results space, wherein the results advertisement includes information for enabling access of the results data. The Examiner argues that Ballantyne's modified applications can generate XML data that "may comprise invoice, billing statements, or any other type of report data includes advertisement" and that "one of ordinary skill in the art would recognize that an XML schema could be used to describe any number of outputs in XML format includes invoices and advertisements." The Examiner has apparently confused the output of commercial advertisements with providing a results advertisement for the results data, wherein the results advertisement includes information for enabling access of the results data. The Examiner has not cited any portion of Ballantyne that mentions providing an advertisement that includes information for enabling access of the outputted invoices, billing statements, etc, which the Examiner equates to the results data of Applicants' claims.

The Examiner states, "it would have been obvious to one of ordinary skill in the art at the time of the invention to produce advertisements as 'result data' since an XML schema can be used to produce XML formatted data." However, claim 8 does not recite producing advertisements as result data, but instead recites providing a results advertisement for the results data that includes information for enabling access of the results data. Therefore, the Examiner's statement is irrelevant.

Thus, the rejection of claim 8 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks apply to claim 27.

In further regard to claim 10, Ballantyne does not teach or suggest wherein the presentation schema is comprised in a presentation schema advertisement. The Examiner cites column 17, lines 15-25 where Ballantyne states that outputted XML data, such as internal reports may be stored in a database and thus be available for review electronically. However, the cited passage makes no mention of a presentation schema comprised in a presentation schema advertisement. The Examiner argues that the term “report data” could comprise an advertisement and that “an XML schema could be used to describe any number of outputs in XML format including invoices and advertisements.” However, the Examiner is apparently confusing the generation of commercial advertisements with a presentation schema advertisement that includes a presentation schema. Furthermore, the cited passage does not refer to generating any presentation schema, but instead refers only to generating XML data. As noted above regarding the rejection of claim 1, Ballantyne’s system uses an XML schema, which the Examiner equates to the presentation schema of Applicants claims, to modify existing legacy application to output XML data. Ballantyne does not describe that his modified applications generate or provide XML schemas, as suggested by the Examiner. Moreover, Ballantyne makes not mention whatsoever regarding any presentation schema advertisements including presentation schemas. Following the Examiners argument, the XML schema used to modify a legacy applications would have to be comprised in the output of that modified legacy application. Such an interpretation cannot be correct.

Thus, for at least the reasons above, the rejection of claim 10 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks apply to claims 28 and 50 as well.

Claims 12, 30 and 52 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ballantyne in view of Sravanapudi et al. (U.S. Publication 2001/004960)

(hereinafter “Sravanapudi”). Applicants traverse the rejection of claims 8, 10, 27, 28 and 50 for at least the reasons given above regarding their respective independent claims.

Regarding both the § 102 and § 103 rejections, Applicants assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

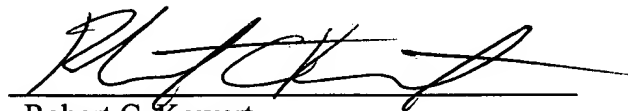
Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-57700/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Other:

Respectfully submitted,



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